



Legal Department, Floor 17
800 Boylston Street, Boston, Massachusetts 02199

William S. Stowe
Assistant General Counsel

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April 29, 2002

VIA COURIER

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, Floor 2
Boston, MA 02110

**Re: D.T.E. 01-95
Petition of Franklin W. Olin College of Engineering
Boston Edison Responses to Record Requests**

Dear Secretary Cottrell:

Enclosed herewith for filing in the above-captioned matter are Boston Edison Company's responses to Record Requests WMLP-RR-2, WMLP-RR-3, WMLP-RR-4, and WMLP-RR-5

If there are any questions regarding this submittal please contact the undersigned.
Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "William S. Stowe", written in a cursive style.

Enclosures

cc: Robert Hayden, Hearing Officer
Shashi Parekh, Utility Engineer, Electric Power Division
Eric J. Krathwohl, Esq.
Kenneth Barna, Esq.
David S. Rosenzweig, Esq.
Richard Joyce, Director WMLP
Stephen P. Hannabury, Vice President Olin College

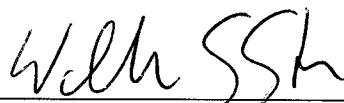
**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Franklin W. Olin College of Engineering

D.T.E. 01-95

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing responses to record requests in accordance with the Department rules.



William S. Stowe
Attorney for
Boston Edison Company
Legal Department, Floor 17
800 Boylston Street
Boston, MA 02199

DATED: April 29, 2002

Record Request WMLP-2

Please provide any cost analysis that Boston Edison had at the time of Mr. Kiely's letter on September 19, 2000, to the MWRA of the cost of Boston Edison to serve this MWRA facility in Needham.

Response

The only cost analysis that can be located is in an email and appears to be an estimate of the account representative, which for purposes of the estimate assumes Boston Edison would be allowed to locate Company lines in the Town of Wellesley. Attachment WMLP-RR-2 (A) is a copy of that email. Attachment WMLP-RR-2 (B) is a copy of information provided by the MWRA concerning the MWRA's overall project with many such installations in the Framingham to Boston area and with a drawing concerning the Winding River Road location.

From: Amann, David
Sent: Monday, September 11, 2000 12:48 PM
To: Kiely, Charles; Stevens, Jeffrey
Cc: Horan, Douglas; Rabadjija, Neven; Stowe, William; Morrison, Richard; Balcom, Brian; McLaughlin, Deborah
Subject: RE: Consent to Serve Fringe Customer

Chuck,

Wellesley can supply the MWRA more readily than NSTAR and will charge the customer 100 % for installation. The location is well behind a house we service. In order for NSTAR to supply we would have to go in front of this house, into Wellesley, down a dirt road, and back into our service territory. The cost would be in the \$10,000+ range for a \$8.14 per month account. The location cannot be access for further expansion because of conservation land and MWRA's right-of-way.

I recommend we sign the letter that Jeff attached.

Dave



FAX TRANSMISSION

MASSACHUSETTS WATER RESOURCES AUTHORITY
DESIGN INFORMATION SYSTEMS CENTER
100 FIRST AVENUE, BUILDING 39 4TH FLOOR
BOSTON, MASSACHUSETTS 02129

(617) 242-8000
FAX: (617) 788-4886

DATE: 1/13/00

TO:

NAME: DAVID AMAN

COMPANY: BOSTON EDISON

TEL.: (781) 441-8123

FAX #: (617) 472-2976 ← (HAD NO SUCCESS WITH THIS NUMBER)!

FROM:

NAME: J. SILVA

DIV./DEPT.: E+G/TECH. SUPPORT

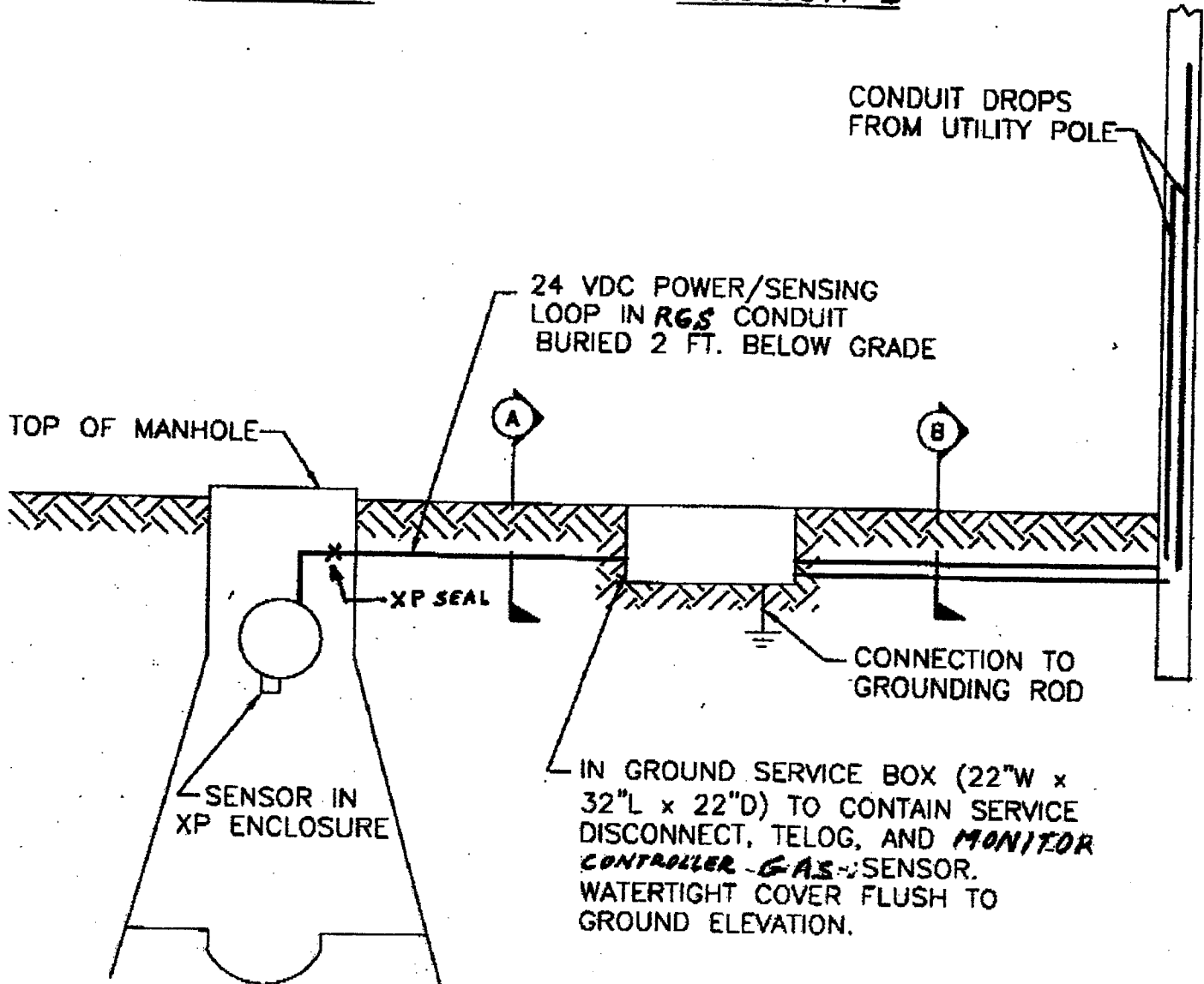
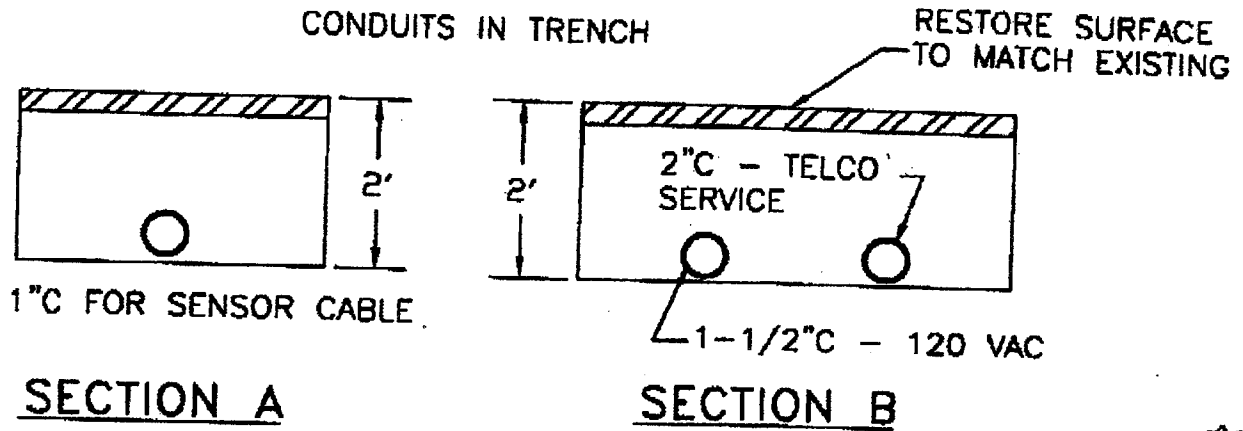
EXTENSION: (617) 788-4339

NUMBER OF PAGES (INCLUDING COVER SHEET): 3

MESSAGE: DAVE

THE ATTACHED SKETCHES SHOW WHAT WE PROPOSE TO DO.
IN-GROUND SERVICE BOX WITH SERVICE DISCONNECT, INSTRUMENTATION,
AND TELEMETRY EQUIPMENT. B.E.C.O. METERS WOULD BE
INSTALLED AT ONLY TWO LOCATIONS THAT ALREADY HAVE
ABOVE GRADE "SIDEWALK" ENCLOSURES. ALL THAT IS
REQUIRED TO RUN THE EQUIPMENT IS 120V-AC, 21ST
AMPS. ALL SITES HAVE RESIDENTIAL DISTRIBUTION LINES
BY B.E.C.O.. WE HAVE SOME POLE NUMBERS, OTHERS COULD
NOT BE READ OFF THE POLES. PLEASE ADVISE. THANK YOU.

INSTALLATION DETAILS



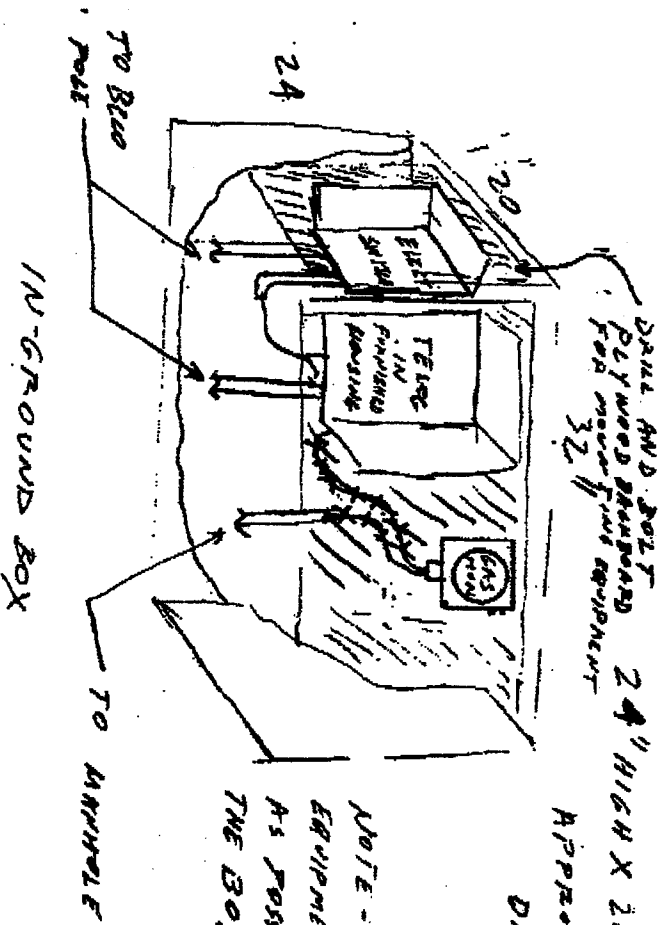
IN-GROUND BOX

DRILL AND BOLT
PLYWOOD DIMENSIONS 24" HIGH X 20" W X 32" L
FOR MOUNTING EQUIPMENT

APPROXIMATE

DIMENSIONS

NOTE - MOUNT
EQUIPMENT AS HIGH
AS POSSIBLE IN
THE BOX.



September 17, 1999

Dave –

The table lists the locations we will be doing monitoring. Only the locations with an "X" in the H₂S (hydrogen sulfide) meter column would need power. Please note that locations K3 and K4 already have traffic boxes with electric meters.

The map shows the locations – the numbers are the same as the numbers on the table, and the "F", "S", and "H" indicate what kind of monitoring we plan to do at each location. "H" is for hydrogen sulfide meter.

I'll call you next week to find out whether I need to include bid items for traffic boxes. If you need to reach me, my number is (617) 788-4816.

Thanks!

Nancy Ettele

Table 1
Framingham Corrosion & Odor Project
Sampling Locations

LIMS	H2S Meter	Flow Meter (1)	Sampler	Address Notes	Phone	Power	Traffic box
13	X	P (FR-NA-1)	X	222 Arthur Street, Framingham. Pole # NET&T: 282, 2. Note: Contractor will need to run conduit from electrical box next to diversion chamber to the pump station. Contractor will need to install H2S meter, run signal wire from meter through existing conduit to telog inside pump station, and provide appropriate power to the H2S meter.	no need	no need	no need
08	X	P (FR-NA-1)	X	222 Arthur Street, Framingham. Pole # NET&T: 282, 2. Note: Contractor will need to run conduit from electrical box next to diversion chamber to the pump station. Contractor will need to install H2S meter, run signal wire from meter through existing conduit to telog inside pump station, and provide appropriate power to the H2S meter.	no need	no need	no need
14	—	X	—	This manhole is located in short center field, in front of Memorial Elementary School.	no need	no need	no need
15	—	—	X	This manhole is on the left side of the road under a pile of dirt. Ask SMY to deliver a pile of sand.	no need	no need	no need
17	X	—	X	This location is accessed from the "Meandering Path" on the Elm Bank. DO NOT drive down Turtle Lane. NOTE: This location will need a wooden cover for sampling access.	Need one phone line manhole	Need one power to manhole	Need one box
18	X	X	X	Pole # NET&T, 148, H3. NOTE: This location will need a wooden cover for sampling access.	Need one phone line manhole	Need one power to manhole	Need one box
19	X	X	X	Same pole # at SL18. This manhole is over the guard rail and a short distance down the slope toward the river. NOTE: This location will need a wooden cover for sampling access.	Need one phone line manhole	Need one power to manhole	May be able to share with 18.
20	X	P (DE-BO-2)	X	150 Bridge St, Dedham (McGolf Driving Range parking lot). MH is in parking space near range.	Need one phone line manhole	Need one power to manhole	Need one box
21F	X	P (WRT-1)	—	131 Navarre Street, Hyde Park. Boston Edison Pole #3. NOTE: There is already a flow meter installed in this manhole.	Need one phone line manhole	Need one power to manhole	Need one box
21	—	—	X	118A Grew Ave. No power or phone necessary. Sampler to be put in environmental enclosure next to manhole (in plantings at end of condo parking lot).	No need	No need	No need
22	X	P (BO-MI-1)	X	18 Montponset Street, Mattapan. Boston Edison Pole #3. NOTE: Need to remove the 3 top rungs inside the manhole. Need to establish "No Parking" over the manhole. There is already a flow meter installed in this manhole.	Need one phone line manhole	Need one power to manhole	Need one box

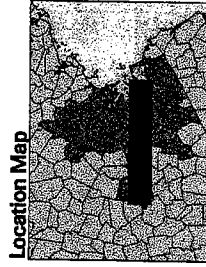
Table 1
Framingham Corrosion & Odor Project
Sampling Locations

LIMS	H2S Meter	Flow Meter (1)	Sampler	Address, Notes	Phone	Power	Traffic box
✓ 123	X	-	-	Natick: FES Station number 123+85, Section 657, VFW, Route 135. Pole # NET&T 57. On West Central Street at the VFW. This location already has a traffic box. Not sure if power line goes into manhole. Not sure if phone lines go to box or manhole.	Need one phone box	May need power to manhole	No need
✓ 124	X	-	-	Natick: FES Station number 71+98, MH 132-8, just upstream of upstream Elliot Street siphon headhouse. Between #80 and 88 Elliot Street, Natick. This location already has a traffic box, but we don't know whose it is.	Need one phone box	Need power to manhole	No need
125	X	-	-	Dover: FERS Station number 49+84, Contract 5322 (no Section # yet). Location of future Wellesley connection ("Cheney Drive manhole"). This manhole is on Cheney Drive on the way into the Elm Bank Reservation. It has been marked with an orange dot. The chamber has a pump, so presumably there is power there, but the chamber is covered with plastic and mulch. Nearest pole is at Elliot Street (NET&T, 76, WEL).	Need one phone box	Need power to manhole	Need one box
127	X	-	-	Wellesley: WESR, station number 189+88, Winding River Road (Scammus) Section 632. This manhole is behind 161 Winding River Road, but access is through woods, not yard (see marked turnout with chain).	Need one phone box	Need power to manhole	Need one box
1210	X	-	-	West Roxbury: WRT Station number 148+80, Section 637, just upstream of the West Portal. Between # 95 and 97 New Haven Street. Nearest pole is Boston Edison 12.	Need one phone box	Need power to manhole	Need one box

Notes: (1) P = Permanent Meter
- = No meter or no sampler



Framingham Extension Sewer Chemical Addition Monitoring Locations



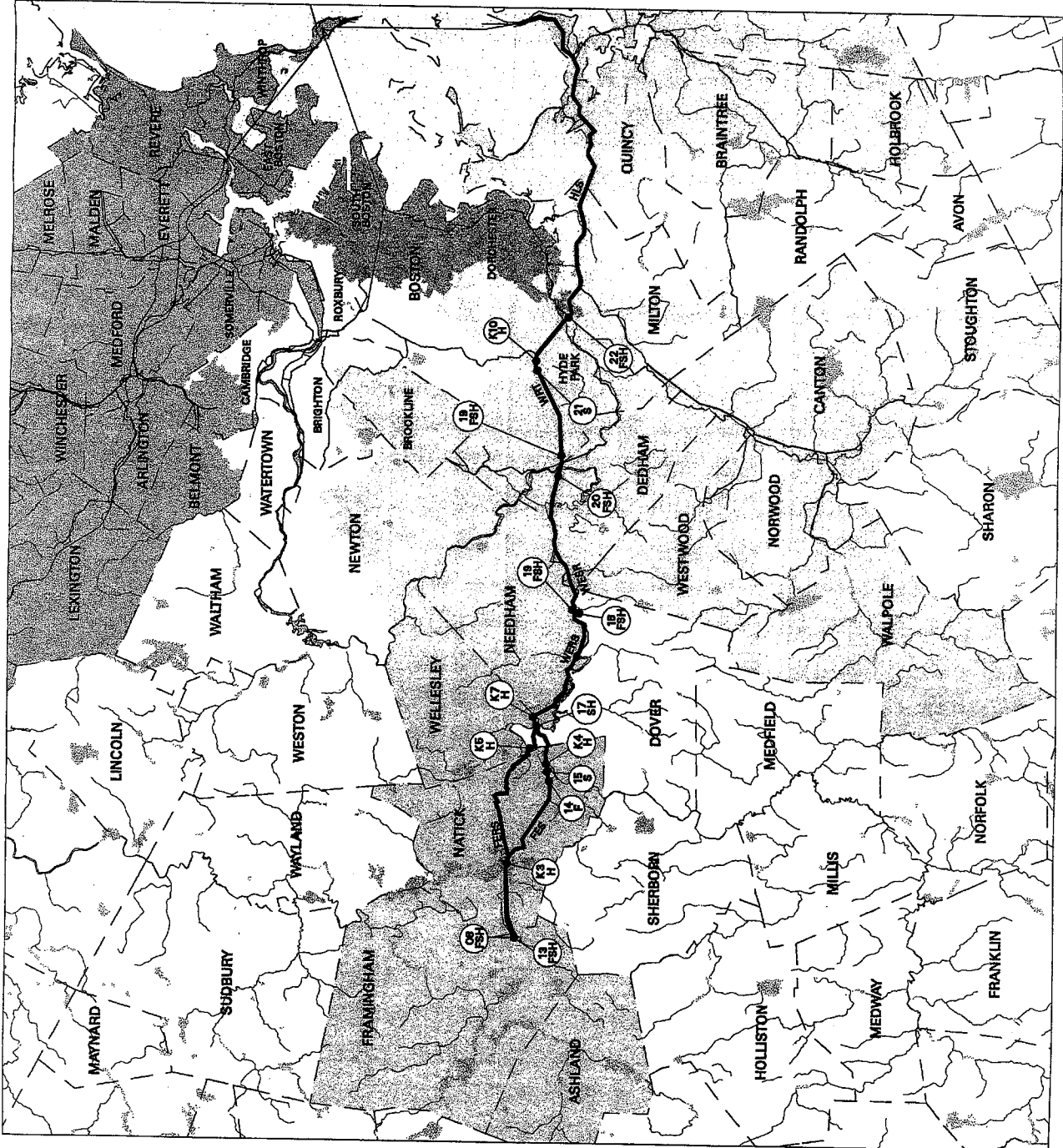
MILES
0 0.5 1 2

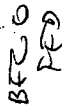
Legend

- F Flow Meter
- S Sampler
- H Hydrogen Sulfide Meter
- 21 Monitoring Location Number
- MWRA Sewer Lines
- FERS Framingham Extension Relief Sewer
- FES Framingham Extension Sewer
- WERS Wellesley Extension Relief Sewer
- WESR Wellesley Extension Sewer Replacement
- WRT West Taubert Tunnel
- HLS High Level Sewer
- Chelms Creek Headworks
- Nut Island Headworks
- Columbia Park Headworks
- Winthrop Headworks



NE-MAP1



[illegible]

Record Request WMLP-3

Please provide a copy of the J. D. Powers report ranking customer satisfaction of electric utilities by medium-sized businesses in the United States.

Response

Upon further investigation it has been determined that there is no single document which comprises the "J. D. Powers report." Rather there is a set of software containing various data, which can be manipulated by an authorized user to prepare presentations and reports and for other authorized use thereof. Moreover, the software and the information contained therein is copyrighted and is owned by, and a trade secret of, J. D. Power and Associates. The Company has a copy of the software pursuant to a license agreement, which does not permit release of the software or the information contained therein to third parties and permits use of the software and the information only by authorized personnel on Company premises. Therefore, the Company is contractually unable to provide the requested report.

In addition, Boston Edison continues to object to this record request on the basis of relevance. Issues of reliability and customer satisfaction, as set forth in a dated customer survey such as that reflected in the J.D. Power and Associates software, are not relevant to the legal issue of Boston Edison's statutory franchise right to serve customers located in the Town of Needham or the fact that Boston Edison is ready, willing and able to provide Olin College with reliable and cost-effective distribution service, in accordance with the Company's Terms and Conditions.

Without waiving its objections, and in an attempt to provide information that has already been made public by J.D. Powers and Associates, the Company has attached a copy of the press release issued by J.D. Power and Associates concerning the customer survey.

**CONTACT: Michael P. Greywitt (818) 889-6330, West Coast
John Tews (248) 267-6800, East Coast**

**J.D. Power and Associates Reports:
Major Improvements Reported in Electric Utility Customer Satisfaction
Among Midsize Businesses**

Power Quality and Reliability Have Most Impact on Overall Satisfaction

FOR IMMEDIATE RELEASE: March 19, 2002

AGOURA HILLS, Calif.—Electric utility companies across the United States are performing dramatically better than last year, according to the J.D. Power and Associates 2002 Electric Utility Midsize Business Customer Satisfaction StudySM released today.

The study's nationwide customer satisfaction index has risen impressively—from 92 points in 2001 to 100 in 2002.¹ Nearly every utility rates higher, with 35 of 41 utilities included in the study significantly improving their performance by at least four index points. While only seven utilities had an overall customer satisfaction index of 100 or more in 2001, 22 utilities achieved a score of 100 or better this year. A score of 100 represents industry average.

“With several utilities moving way out in front of the pack, the other utilities need to pay more attention to satisfying their customers than ever before,” said Alan F. Destribats, executive director of the utility practice at J.D. Power and Associates.

Power quality and reliability is now the most important factor comprising overall customer satisfaction. Company image also is an important component, but slides from first to second in impact. The other key components of overall satisfaction are price and value, billing and payment, and customer service.

¹ Data in this press release reflect a change in the methodology for calculating customer satisfaction indices. Indices representing performance from prior years have been recalibrated in this release reflecting the change for comparison purposes, and therefore it is not appropriate to compare data from previous press releases with this one.

"Utility management attention and investment in power delivery are paying off," said Destribats. "Midsize business customers reported the fewest number of interruptions this year."

The study shows that performance in power quality and reliability has improved from an average of 5.3 interruptions per customer per year in 2000 and 2001 to 4.7 interruptions in 2002.

Retail sales of electricity continue to struggle. According to midsize business customers eligible to choose a new electricity supplier, less than 3 percent currently have an alternative supplier, while 9 percent had switched in 2001 and 5 percent in 2000.

The 2002 study also focuses on the interest of midsize business customers in energy and communication products and services. Customers were surveyed about their interest in various products and services and were asked to rate how well they think their electric utility would perform as a provider of these services.

"Our study shows that the higher the overall level of satisfaction with electricity service, the more likely midsize businesses are to view their utility as a competent provider of other products and services," said Destribats.

The top 10 utilities rated the highest as potential providers of these products and services are Alliant Energy, Northeast Utilities, Southern Company, Los Angeles Department of Water and Power, Cinergy, LG&E Energy, Progress Energy, Puget Sound Energy, Duke Power and Baltimore Gas and Electric.

J.D. Power and Associates interviewed representatives from more than 7,800 midsize businesses throughout the United States, including manufacturers, retailers, business and consumer services firms, and health care providers. Midsize businesses are defined as those that normally spend \$1,500 to \$25,000 per month on electricity. The study shows that midsize businesses are now spending an average of \$5,056 per month on electricity—up 5 percent over 2001.

West Region

The top-ranked electric utility in the West Region is the Los Angeles Department of Water and Power, jumping 12 index points from 2001. The utilities in the West Region showing the most

improvement are San Diego Gas and Electric, Pacific Gas & Electric, Puget Sound Energy and Southern California Edison. The California utilities have rebounded significantly from the power crisis of 2000-2001.

Midwest Region

For the third year in a row, LG&E Energy ranks highest in overall customer satisfaction with midsize business electric service in the Midwest, earning the highest customer satisfaction index score among all utilities included in the study. Other utilities in the Midwest Region with the greatest improvement since 2001 include Exelon-ComEd, Cinergy, Ameren and Xcel-NSP.

South Region

Southern Company ranks highest in overall customer satisfaction for midsize business electric service in the South Region for the third straight year. The most improved utilities in the South Region are TXU Electric and Gas, Duke Power, Dominion Virginia Power, Progress Energy, Florida Power & Light and Reliant Energy HL&P.

East Region

Baltimore Gas and Electric ranks highest in overall customer satisfaction with midsize businesses in the East Region. BG&E improves an impressive 12 points over 2001 to overtake two-time midsize business customer study awardee PPL Electric Utilities. Included among East Region utilities showing the most improvement over 2001 are Con Edison, Long Island Power Authority, Northeast Utilities and Allegheny Power.

Headquartered in Agoura Hills, Calif., J.D. Power and Associates is a global marketing information services firm operating in key business sectors including market research, forecasting, consulting, training and customer satisfaction. The firm's quality and satisfaction measurements are based on actual responses from millions of consumers annually. J.D. Power and Associates can be accessed through the Internet at www.jdpa.com. Media e-mail contact: michael.greywitt@jdpa.com or john.tews@jdpa.com.

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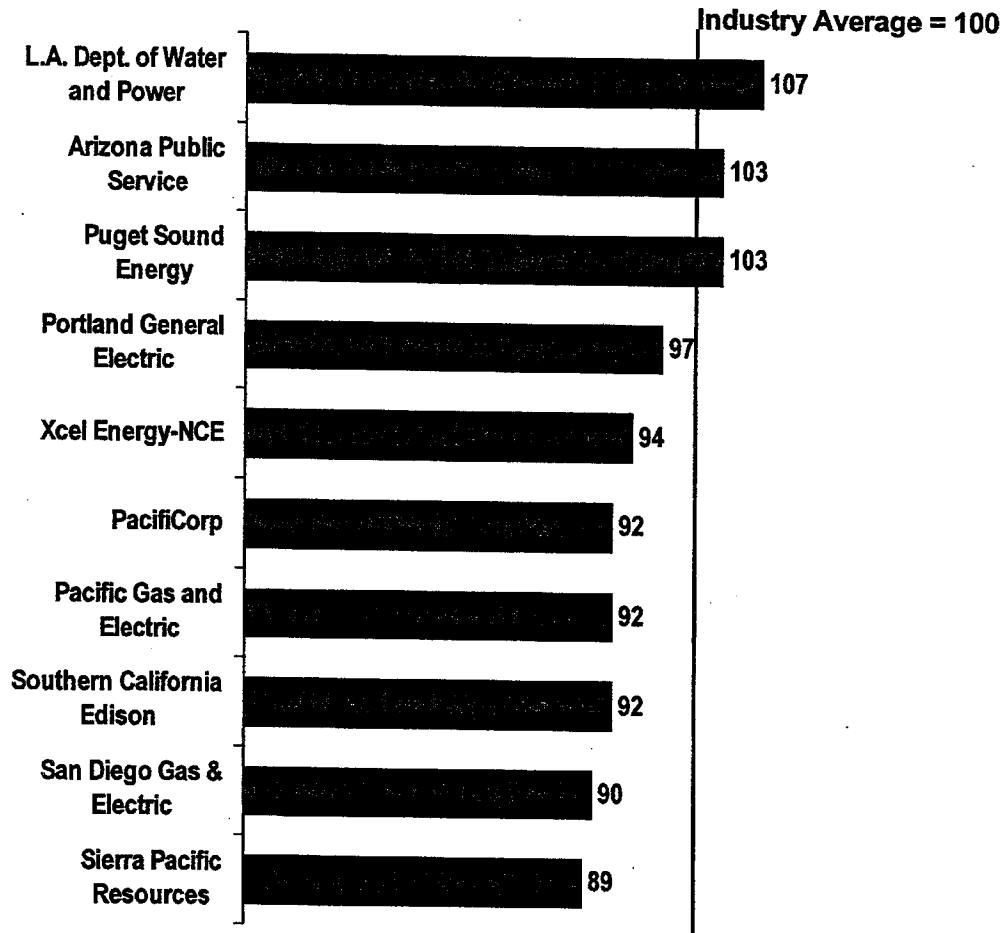
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(Page 3 of 3)

Note: Four charts follow.

J.D. Power and Associates 2002 Electric Utility Midsize Business Customer Satisfaction StudySM

West Region Customer Satisfaction Index



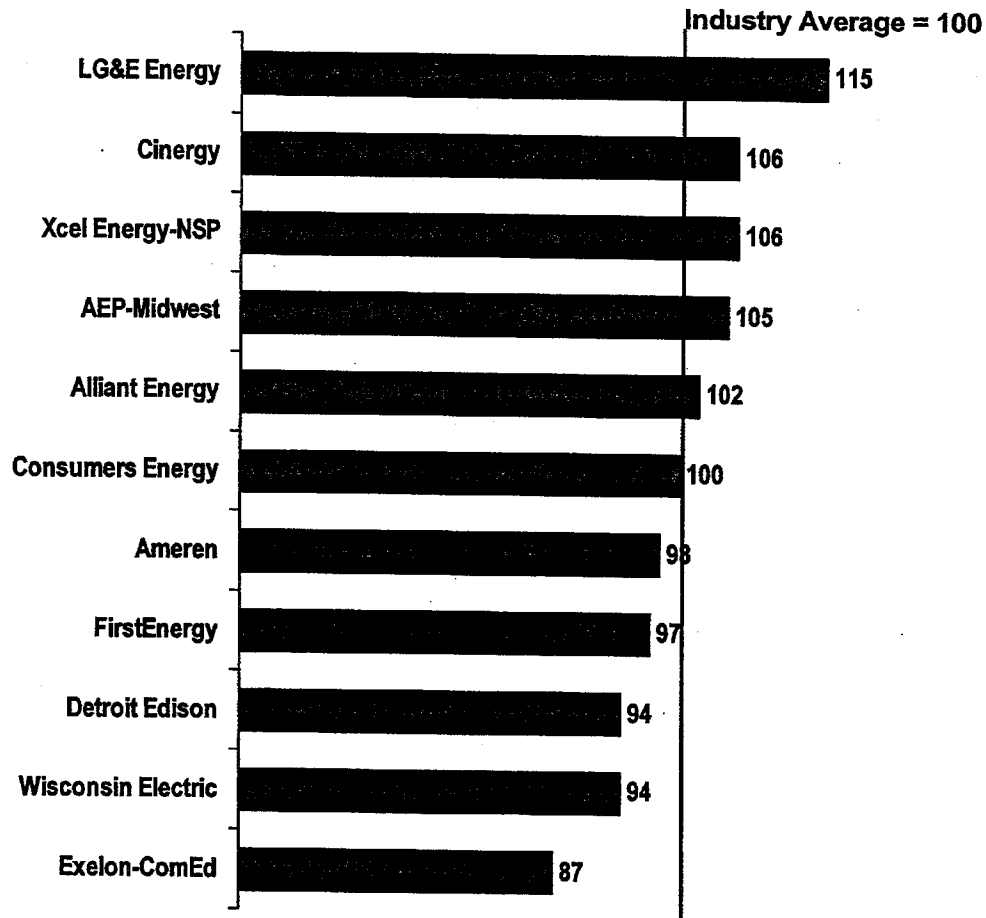
Source: J.D. Power and Associates 2002 Electric Utility Midsize Business Customer Satisfaction StudySM

Special Note: Data in this press release reflect a change in the methodology for calculating customer satisfaction indices. It is not appropriate to compare data from previous press releases with this one.

Charts and graphs extracted from this press release must be accompanied by a statement identifying J.D. Power and Associates as the publisher and the J.D. Power and Associates 2002 Electric Utility Midsize Business Customer Satisfaction StudySM as the source. No advertising or other promotional use can be made of the information in the release or J.D. Power and Associates survey results without the express written prior consent of J.D. Power and Associates.

J.D. Power and Associates 2002 Electric Utility Midsize Business Customer Satisfaction StudySM

Midwest Region Customer Satisfaction Index



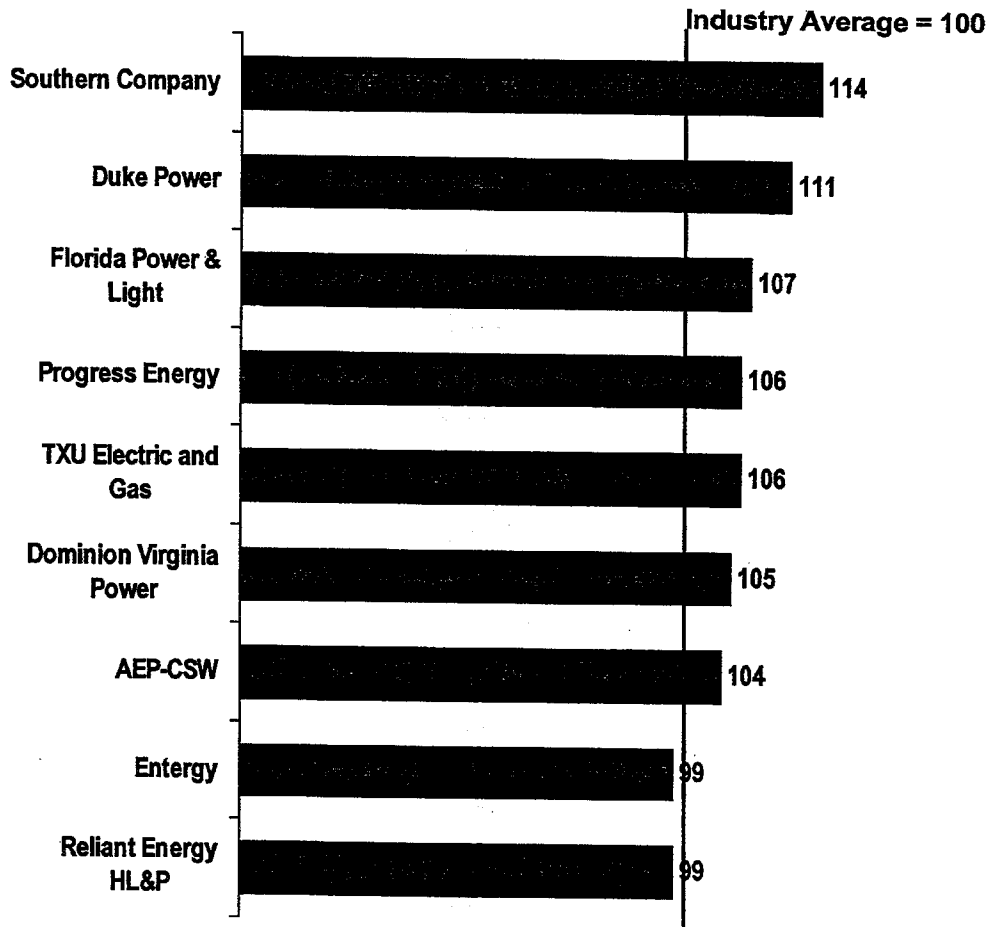
Source: J.D. Power and Associates 2002 Electric Utility Midsize Business Customer Satisfaction StudySM

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J.D. Power and Associates 2002 Electric Utility Midsize Business Customer Satisfaction StudySM

South Region Customer Satisfaction Index



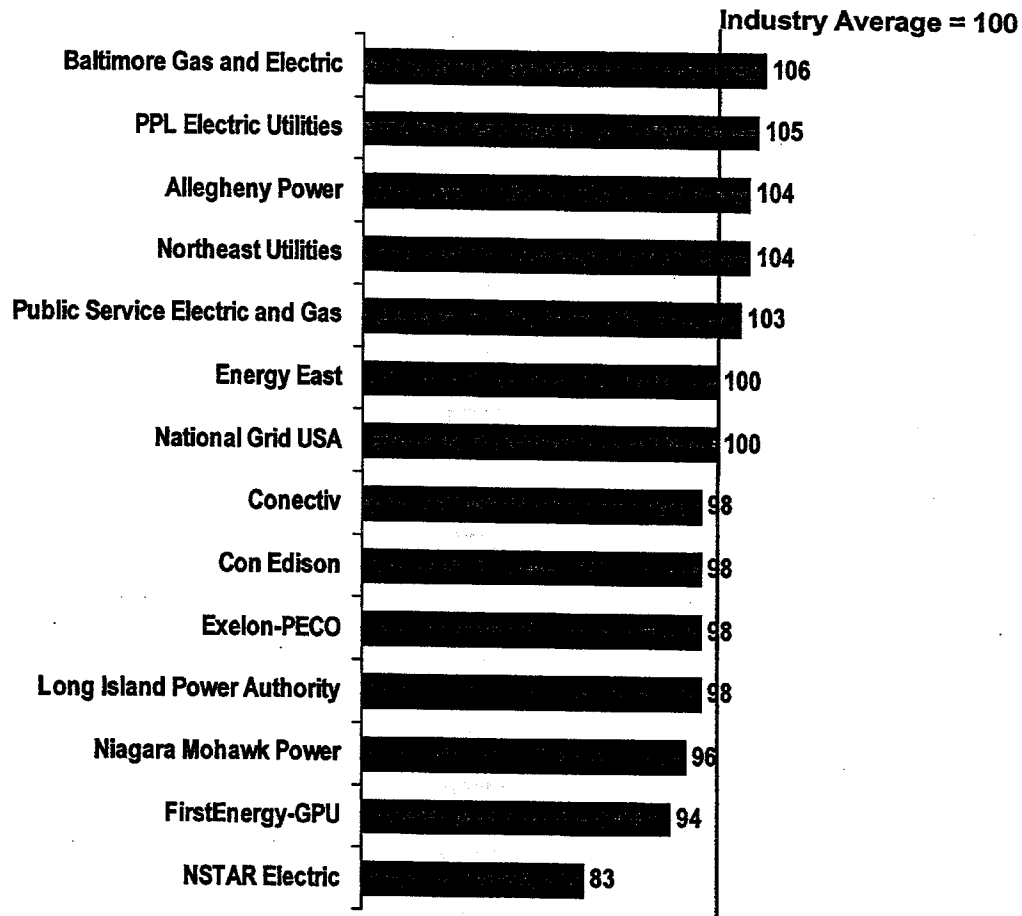
Source: J.D. Power and Associates 2002 Electric Utility Midsize Business Customer Satisfaction StudySM

Special Note: Data in this press release reflect a change in the methodology for calculating customer satisfaction indices. It is not appropriate to compare data from previous press releases with this one.

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J.D. Power and Associates 2002 Electric Utility Midsize Business Customer Satisfaction StudySM

East Region Customer Satisfaction Index



Source: J.D. Power and Associates 2002 Electric Utility Midsize Business Customer Satisfaction StudySM

Special Note: Data in this press release reflect a change in the methodology for calculating customer satisfaction indices. It is not appropriate to compare data from previous press releases with this one.

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Record Request WMLP-4

Please provide any and all requests that Boston Edison made to the Wellesley Municipal Light Plant or the Town of Wellesley with respect to laying lines or setting poles in Wellesley in order to serve the MWRA in Needham.

Response

The witness is not aware of any such request made specifically with respect to the MWRA location. The witness is aware only of a recent request made in connection with another border location (i.e., the Design Housing matter), which was rejected by WMLP, and of the position stated by Mr. Joyce in testimony in this proceeding (see Transcript Volume 2, page 228), which would suggest that such a request would not have been favorably received.

Record Request WMLP-5

Please confirm whether or not Pole #23, which is located on the Needham/Wellesley municipal border, is owned by Wellesley Municipal Light Plant or Verizon.

Response

To answer this record request, Boston Edison consulted its own records and also requested information from Verizon regarding the ownership of Pole #23. Boston Edison's survey records, dated September 3, 1987 indicate that Pole #23 is located over the town line in Wellesley and that Boston Edison has no ownership interest in that pole. A copy of this record is Attachment WMLP-RR-5-A. Verizon's records indicate that Pole #23 on Winding River Road is located in Wellesley and is jointly owned by Verizon and WMLP with the equity in the pole divided 45 percent to Verizon and 55 percent to WMLP. A copy of this record is Attachment WMLP-RR-5-B. Therefore, as best as Boston Edison can determine, WMLP is the majority owner of Pole #23, located in Wellesley.

WINDING RIVER RD

NEEDHAM

9-03-87

STREET

MUNICIPALITY

SHEET 2

ISSUED

POLE
NUMBERLOCATION DIAGRAM
POLES

OWNERSHIP

MAINT.

SPAN

H'G'T.

KIND

DATE
SETDATE
R'P'L'DDATE OF
AGREEMENT

382/13

TV

T E

1512' 35

P

59

740727

14

TV

T E

156.2 35

P

59

15

TV

T E

1730 35

P

59

16

TV

T E

1840 35

P

59

WELLESLEY

TOWN LINE

P/23

D.T.E. 01-95

Attachment WMLP-RR-5 (A)

Edit Pole 10682440 - MAWELLESLEY

Address

Municipality Code:	6224001	Exchange:	WELLESLEY
Street Name:	WINDING RIV ...	District	DUMMY
Hwy/Pvt:	HIGHWAY	Wire Center:	WELLESLEY MA
Pole Sequence:	23	Location Reference:	
Route:	WINDING RIVE	Maintenance Party:	TELEPHONE
Foreign Route:		Pole Number:	23
Old Route:		Foreign Pole Num...	
Item Number:		Old Pole Number:	
Placing Job #:		Removing Job #:	
Placing Print #:		Removing Print #:	

Pole Summary:

Route: WINDING RIVE

Pole Number: 23

Street Name: WINDING RIVER R

Pole ID: 10682440

For Pole Record

Billing...
Anchors...
ROW Grant...
Remarks...

Exist For Pole

Billing Remarks:

Anchors:

Active EON 0

Ann: 28-b

Edit Pole 10682440 - MA/WELLESLEY

Owners

Owner Name	Owner Type	% Equity	Excess Height	Attached
VERIZON	OWNER	45	0	YES
WELLESLEY M...	OWNER	55	0	YES

Add

Delete

Pole Summary:

Route: WINDING RIVE

Pole Number: 23

Street Name: WINDING RIVER R

Pole ID: 10682440

For Pole Record

Billing...
Anchors...
ROW Grant...
Remarks...

Exist For Pole

Billing Remarks:

Anchors:

Active EON 0